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Items 8 and 15, and returning	copies of the amer	ndment; (b) By acknowled	dging rec	eipt of this amendment on each copy of the off	fer subm	itted; or (c) By
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E. IMPORTANT: Contractor is r		to sign this document and		1 copies to the issuing			
14. DESCRIPTION OF AMENDMENT/MODIFICA	TION (Organized by U	JCF section headings, inc	ciuding s	colicitation/contract subject matter where feasib	de.)		
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specified in the revised							it for
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\$310,173.50 to \$533,695.5	•	•					
The subject task order is							
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COR: Sean Hogan		t					
Alt COR: Lisa Grogan-McCu.	TToch	i					
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Except as provided herein, all terms and condition 15A. NAME AND TITLE OF SIGNER (Type or print)		erenced in item 9A or 10A		etofore changed, remains unchanged and in full NAME AND TITLE OF CONTRACTING OFFIC			
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NSN 7540-01-152-8070				. ST	ANDAR	U FORM 3	30 (REV. 10-83)

NSN 7540-01-152-8070 Previous edition unusable STANDARD FORM 30 (REV. 10-83) Prescribed by GSA FAR (48 CFR) 53.243

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AGE 2

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A)	(B)	(C)	(D)	(E)	(F)
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	LIST OF CHANGES:				
	Reason for Modification : Supplemental Agreement	ĺ	f [
	for work within scope				
	Period Of Performance End Date changed from	17			
	2013-03-11 00:00:00 to 2013-09-30 00:00:00		l		
	Total Amount for this Modification: \$223,522.00				
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	Percent: 6.25714				
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ITEM NO. (A)	SUPPLIES/SERVICES (B)		QUANTITY UNIT	UNIT PRICE (E)	AMOUNT (F)
	1200 Pennsylvania Avenue NW Mail Code: 62107J OAP/CCD Washington DC 20460 USA				-,-
	Period of Performance: 03/12/20	12 to 09/30/2013			,
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STATEMENT OF WORK

Title: Support for Development of Verification Process for Greenhouse Gas Reporting Program

Task Order Project Officer (TOPO):

Sean Hogan

US Environmental Protection Agency 1200 Pennsylvania Avenue, NW (6207J)

Washington DC 20460 Phone: (202) 343-9233 Fax: (202) 343-2359

E-mail: <u>Hogan.sean@epa.gov</u>

Alternate TOPO:

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Washington DC 20460 Phone: (202) 343-9743 Fax: (202) 343-2210

E-mail: Grogan-McCulloch.Lisa@epa.gov

Contracting Officer (CO):

Christopher O. Jenson

U.S. Environmental Protection Agency 1200 Pennsylvania Ave, NW (3803R)

Washington, DC 20460 Phone: (202) 564-3268 Fax: (202) 565-2554

Email: jenson.christopher@epa.gov

I. BACKGROUND

In September 2009, EPA finalized the regulatory action that launched the EPA's Greenhouse Gas Reporting Program (GHGRP). Covered facilities will report 2011 GHG data to EPA on either March 31, 2012 or September 28, 2012, by using a web platform developed by EPA called the electronic GHG Reporting Tool ("e-GGRT") or by submitting a bulk XML file. The GHGRP is an annual reporting program, with report submissions due in subsequent years on March 31 of each year.

GHG data reported under the GHGRP will be verified by EPA. Prior to EPA verification, reporters are required to self-certify that the data they submit to EPA is truthful, accurate and complete. EPA reviews the GHG data, including emissions data from direct emitters and supporting data submitted from reporters, and verifies that they are complete, accurate, and meet the reporting requirements of this rule. EPA data verification ensures accuracy and completeness, such that EPA and the public are confident in using the data for developing climate policies and potential future regulations. Data that are not entitled to confidential

treatment will be published on EPA's website for public analysis.

In implementing verification of GHGRP data, EPA has developed a three step process, described below.

- 1. Automated Review of Data. First, EPA conducts an initial centralized review of the data which is largely automated. The automated review consists of two components. The first component is built in e-GGRT and is designed to provide reporters with real-time feedback before they officially submit their data. The second component is built in stand-alone software, referred to as the Verification Tool (VT), which pulls post-submittal data from e-GGRT and run pre-programmed tests to more closely assess the completeness and accuracy of the data. Both e-GGRT and VT generate output reports to summarize the verification findings and to flag possible errors and inaccuracies for follow-up.
- 2. Staff Review of Data. Second, subpart leads review the output reports, following program-wide instructions on verification priorities and procedures, and notify reporters of any potential errors, discrepancies, or questions. The purpose of this step is for reporters to resubmit their annual reports with corrected data or for the subpart leads to otherwise resolve the flags through analysis and communication with the reporters.
- 3. On-Site Visits. Third, EPA will maintain the option to conduct on-site visits of selected facilities and suppliers, in the event centralized verification identifies issues which warrant site visits to resolve. The purpose of site visits would be to further evaluate reported data based on records that are kept at the facility but not submitted (e.g., GHG monitoring plans), as well as field methods to measure and QA/QC data. To date, EPA has not encountered a situation where an on-site visit is required and it is considered to be unlikely in the future.

To date, EPA has developed and implemented this verification process, with exception for the on-site visits. The scope of this effort has included developing and coding the specifications for all of the checks that the VT used for 28 subparts, including range checks, algorithm logic checks, statistical tests, and substitute data checks. This also included developing the Oracle tables that were used to transfer GHG data and VT output reports between e-GGRT and the VT. Furthermore, this included developing the format and organization of the program-wide verification instructions and extensively researching the availability of outside data sources which could be used to evaluate data quality. In September 2011, the GHGRP received data for Reporting Year 2010 (RY2010), which was the first year that data was collected and successfully verified by the Program.

As further described in this SOW, future work will entail making updates to the VT and verification process before the GHGRP receives the next round of data in March and September 2012, running the VT and performing other verification procedures in 2012 and future years, and making ongoing improvements to the VT and verification process. With respect to ongoing

improvements, EPA is continually striving to more effectively integrate the GHGRP data collection system (e-GGRT) and the verification process. Therefore, while this SOW presents an approach for performing verification, EPA remains open to consider other tools and/or processes that meet the same objectives and schedule.

II. SCOPE

The work outlined under this requirement is consistent with Section 1.2.5 of the Contract Statement of Work.

III. TASKS AND DELIVERABLES

Task 1: Project Management

The Contractor shall provide project management under this task, and shall submit a Monthly Status Report to EPA's TOPO and Contracting Officer (CO) in accordance with the Project Reporting section below. During the Period of Performance (POP), the Contractor shall immediately inform the TOPO and CO by telephone and/or email of any problems that may impede performance along with any corrective action needed by the EPA or the Contractor to solve the problem.

Under this task, the Contractor shall also attend a kick-off meeting, either via conference call or in person, whichever is most cost-effective to the U.S. Government, to discuss the goals and strategy for completing the deliverables. This kick-off meeting swill serve as a brainstorming session to clarify the tasks, provide any necessary background material, solicit ideas and feedback from the Contractor, as well as formulate ideas for work to be completed by the Contractor under the Tasks listed below. The contractor shall develop a project timeline based on the statement of work and direction from the TOPO that incorporates the deliverable dates for all tasks. The Contractor, under this task, shall also attend a wrap-up meeting at the end of the POP to discuss work completed under the Tasks.

Deliverables and schedule under Task 1:

Task 1.1	Attend kick-off meeting	Within 1 week of approval of Task Order
Task 1.2	Project Timeline	Within 2 weeks of approval of Task Order
Task 1.3	Monthly Status Report	By 10 th business day each month
Task 1.4	Attend End of POP meeting	At least 2 weeks prior to end of POP, per TOPO direction

Task 2: Critical Review of Existing Verification Process

EPA successfully verified the first round of data collected through the GHGRP and, in the process, gained a lot of valuable experience which will need to be captured and used to further develop and refine the verification process. To this end, the purpose of this task is for the contractor to develop a thorough understanding of the existing verification process and the lessons learned during the first round of verification so that opportunities for improvement are

identified and addressed, where feasible.

To this end, the contractor shall perform a critical review of the existing GHGRP verification process. The objectives of this review are for the contractor to:

- establish a thorough understanding of the existing verification process and the systems used for verification, correspondence, tracking and reporting;
- identify opportunities to improve the existing process and develop recommendations for both near-term and long-term improvements; and
- develop a strategy to implement improvements while meeting the objectives and schedule described in this SOW.

The outcome of this effort will be a list of recommendations to improve the existing verification process and a proposal for implementing these recommendations. In the event EPA supports one or more of the recommendations, the recommendations will be implemented according to a process and schedule agreed upon by the TOPO.

Deliverables and schedule under Task 2:

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Task 2.1	4	Meet with EPA verification	Within 2 weeks of approval of
		team	Task Order
Task 2.2		Summary of recommendations	Within 4 weeks of approval of
		and proposals to improve the	Task Order
		existing verification process	
		and/or systems	

Task 3: Finalize, Test, Deploy, and Operate the Verification Tool (VT)

The VT will need to be updated, tested, deployed and operated in two phases in 2012. Before reporting on March 30, 2012 ("Track 1"), the contractor shall update the VT to reflect any revisions or additions to existing verification plans which were made since reporting and verification of data in 2011. Before reporting on September 28, 2012 ("Track 2"), the contractor shall perform the development and testing required for deploying and operating the VT with 12 additional subparts, along with any additional enhancements.

The VT was designed according to verification plans that were developed for each subpart. Each verification plan specifies checks that are used to assess the quality of the individual data elements reported under a particular subpart. The type of checks includes reasonable range checks, algorithm checks, statistical analyses checks, and completeness checks. Since using the VT to verify RY2010 data, the verification plans have been revised (e.g., modified existing checks and added new checks). The contractor shall update, test and deploy the VT software to incorporate any such changes to the verification plans before EPA receives data on March 30, 2012.

EPA added 12 source categories to the GHGRP which will report data for the first time on September 28, 2012. These source categories are:

- Electronics Manufacturing (Subpart I)
- Fluorinated Gas Production (Subpart L)
- Magnesium Production (Subpart T)
- Petroleum and Natural Gas Systems (Subpart W)
- Use of Electric Transmission and Distribution Equipment (Subpart DD)
- Underground Coal Mines (Subpart FF)
- Industrial Wastewater Treatment (Subpart II)
- Imports and Exports of Equipment Pre-charged with Fluorinated GHGs or Containing Fluorinated GHGs in Closed-cell Foams (Subpart QQ)
- Carbon Dioxide Injection and Geologic Sequestration (Subpart RR)
- Manufacture of Electric Transmission and Distribution (subpart SS)
- Industrial Waste Landfills (Subpart TT) and;
- Injection of Carbon Dioxide (Subpart UU)

The contractor shall assist with developing verification plans for these source categories and, based on these verification plans, the contractor shall update, test and deploy the VT software to incorporate these source categories before EPA receives data on September 28, 2012.

In addition to these updates to the VT, the contractor shall continue to update the VT as the e-GGRT schema and reporting spreadsheets are developed and refined. The contractor shall incorporate new checks and modify existing checks as they are developed throughout the verification process. As directed by the TOPO, the contractor shall continue to update the VT to incorporate system improvements that are developed during and/or after verification of RY2011 data. During final development of the VT, the contractor shall present the TOPO with periodic web-ex demonstrations so that the TOPO can see its progress.

In order to begin testing of the VT integration with e-GGRT, the contractor shall gain access from its server to the NCC server at which e-GGRT and the Oracle tables are housed. The contractor shall test the functionality to populate the Oracle table with XML files as they are generated and to transfer them from the Oracle table to the VT. The contractor shall also test the functionality to populate the Oracle table with the VT output reports as they are generated.

The VT is presently set up on a computer in EPA's CBI room located at 1310 L Street, NW,

Washington, DC, and EPA intends to continue hosting the VT on this computer through 2012. The contractor shall install, test and perform all necessary trouble shooting of the updated versions of VT on this computer before the specified reporting deadlines. This includes conducting user acceptance testing and load testing of the VT, developing a working beta version of VT, and finally developing a working production version of VT. In addition, the contractor shall develop instructions and provide training, as needed, on using updated versions of the VT, as well as providing the support needed to use the VT throughout the verification process.

Once EPA receives GHG data, the contractor shall operate the VT in the EPA CBI room and/or provide EPA with support, as needed, to operate the VT. The contractor shall monitor the performance of the VT and conduct any necessary trouble shooting and software updates to ensure its successful operation. The contractor shall generate output reports at a frequency to be determined (e.g., at least weekly).

Deliverables and Schedule under Task 3:

Deliverables and So	chedule under Task 3:	
A CONTRACTOR OF THE STATE OF TH		Part Control Control
Task 3.1	90% completion of VT coding for all checks identified for 3/30/12 reporting	March 9, 2012
, v	90% completion of VT coding for all new and updated checks identified for 9/28/12 reporting	August 3, 2012
Task 3.2	100% completion of VT coding for all checks identified for 3/30/12 reporting	March 19, 2012
· .	100% completion of VT coding for all checks identified for 9/28/12 reporting	August 27, 2012
Task 3.3	Demonstration of VT for 3/30/12 reporting	Week of April 2, 2012
	Demonstration of VT for 9/28/12 reporting	Week of September 17, 2012
Task 3.4	User acceptance testing for EPA and load testing of VT for 3/30/12 reporting	March 19 – 23, 2012
	User acceptance testing for EPA and load testing of VT for 9/28/12 reporting	August 27 – 31, 2012
Task 3.5	Beta version of VT for 3/30/12 reporting is working	March 30, 2012
	Beta version of VT for 9/28/12 reporting is working	September 7, 2012
Task 3.6	Production version of VT for 3/30/12 reporting is installed and working	April 6, 2012

	Production version of VT for 9/28/12 reporting is installed and working	September 21, 2012	
Task 3.7	Operate.VT for 3/30/12 reporting	April 6 – August 2012	

Task 4: Develop Statistical Tests for Each Subpart

The contractor shall develop subpart-specific statistical checks for verification purposes. To date, statistical checks have not had a significant role in the GHGRP verification process given limitations on the data the Program collects, and there is only one year of data. However, looking ahead, EPA continues to be interested in developing statistical tests to evaluate GHGRP data.

The contractor shall determine what types of statistical analysis could be used to evaluate data collected by the GHGRP for the purpose of data verification. The contractor shall determine both the metrics to be used for verification from a technical standpoint as well as the specific statistical test that should be applied. For example, for many subparts it makes sense from a technical perspective to compare production data, where available, to emissions ratio of all facilities within a subpart, and then identify outliers as potential reporting errors. In this example, the contractor would identify the specific data reporting elements that would be used for the ratio as well as the statistical test that would be employed. EPA expects approximately 5-20 verification checks to be conducted on each subpart (perhaps more for subpart C), depending on the complexity and number of reporters for each subpart. Below are some additional examples:

- Comparing site specific emission factors across facilities within a subpart to identify outliers; and
- If a subpart consists of facilities both with and without CEMS, comparing emissions from facilities without CEMS to emissions from facilities with CEMS.
- Comparing year-to-year emissions and other factors.

EPA expects that the contractor may recommend that some tests be run in parallel while others are run in series. For example, a test which yields outliers in emissions reported may be followed up by a test checking the inputs to the emission equation to isolate which variable caused the emissions to be an outlier.

In completing this task, the contractor shall investigate whether any statistical methods exist that could be applicable beyond the identification of outliers. The contractor shall also consider the use of data in other subparts to verify data in a given subpart. For example, perhaps data reported under subparts MM or P could be used for the purpose of verifying data reported under subpart Y. Lastly, the contractor shall consider whether data from other EPA (or non-EPA) reporting

programs can be used to verify GGRP data.

The contractor shall prepare a strategy to develop and employee statistical checks in the GHGRP verification process. This strategy will present an approach and schedule to develop and implement statistical checks to verify data reported on March 30, 2012 and checks to verify data reported on September 28, 2012. This strategy will outline steps to develop statistical checks, incorporate statistical checks in the VT, and explain how verification issues identified by statistical checks will be used to evaluate data quality. The contractor shall also assess the relative strength of the statistical tests to help determine which statistical checks would be the most valuable for verification. The contractor shall implement the strategy approved by the TOPO.

The contractor shall use data reported to the GHGRP in 2010 and 2011 to derive correlations between different reporting elements and the respective mass of GHG emissions. To date, the contractor has successfully applied this approach to data collected under Subpart C (Stationary Combustion). As a next step, EPA is requesting that the contractor develop statistical checks for other subparts leveraging the Subpart C tabular data that was developed in the initial phase of this TO. The contractor shall use the Subpart C data to define similar sets of data within other subparts and use existing statistical tools to evaluate correlations between stationary combustion attributes and process emissions reported at the subpart level in other subparts. The purpose of this effort will be to develop a subpart level "grade" for subparts with stationary combustion operations. In addition, the contractor shall use the business intelligence software EPA combined with e-GGRT (i.e., "Spago") to extract tabular views of data for other subparts and follow the same approach used for Subpart C to develop statistical routines for determining the overall quality of these data sets, as well as a means for identifying the sources within these data sets that deviate from sector norms.

Deliverables and Schedule under Task 4.

Task 4.1	Draft strategy to develop and implement statistical checks	8 weeks after approval of task order
	Final strategy to develop and implement statistical checks	2 weeks after receiving EPA comments on draft strategy

Task 5: Develop Algorithm Checks

The contractor shall develop algorithm checks to verify GHGRP data and/or refine existing algorithm checks. Similar to statistical analysis checks, the GHGRP has employed algorithm checks to a small extent to verify data. To data, these checks have been developed by the respective EPA subject matter expert (SME) and their contractor to be incorporated in the VT. The purpose of this task is for the contractor to evaluate the algorithm checks used to date and develop a strategy to strengthen existing checks and/or create new checks which would be incorporated into the VT for future verification. The outcome of this effort would be feedback

and guidance to the SMEs to assist them with developing and refining algorithm checks and/or development of algorithm checks for multiple subparts.

To this end, the contractor shall prepare a strategy and schedule to evaluate existing algorithm checks, as well as develop and/or refine and implement new or existing algorithm checks into VT. This strategy will present an approach and schedule to develop and implement algorithm checks to verify data reported on March 30, 2012 and checks to verify data reported on September 28, 2012. The contractor shall implement the strategy approved by the TOPO.

EPA is requesting that the contractor develop algorithm checks for other subparts leveraging the Subpart C tabular data that was developed in the initial phase of this TO. This approach includes the same steps outlined above under Task 4. In addition, the contractor shall use the business intelligence software EPA combined with e-GGRT (i.e., "Spago") to extract tabular views of data for other subparts and follow the same approach used for Subpart C to develop routines for determining the overall quality of these data sets, as well as a means for identifying the sources within these data sets that deviate from sector norms.

Deliverables and Schedule under Task 5.

Task 5.1	Draft strategy to develop and implement algorithm checks	8 weeks after approval of task order
	Final strategy to develop and implement algorithm checks	2 weeks after receiving EPA comments on draft strategy

Task 6: Identify Other Data Sets to Evaluate GHGRP Data

The contractor shall identify existing data sets (e.g., EIA, NEI, State inventories, etc.,) that can be used to evaluate the data received for the 12 subparts listed under Task 3. In addition, the contractor shall develop a strategy to use outside data sets to verify GHGRP data. To date, EPA has identified an extensive list of data sets that are similar to GHGRP data and, therefore, might be useful to evaluate data quality. The purpose of this task is for the contractor to identify data sets that could be used to evaluate data collected under the new subparts, as well as to develop a strategy to effectively use the most relevant outside data sets to evaluate the quality of all GHGRP data.

In addition to identifying data sets for the 12 new subparts, the contractor shall prepare a strategy and schedule to effectively use relevant outside data sets to evaluate GHGRP data. This strategy should present an approach to identify data sets which include data that could be used for verification, as well as an approach to create a system that efficiently and effectively compares GHGRP to relevant data sets. Depending on the system that is proposed for comparing data, this system could be implemented under this contract and/or implemented by the SMEs. The contractor shall implement the strategy approved by the TOPO.

Under this task, the contractor shall follow an iterative strategy of identifying and evaluating relevant external data sets for a specific subpart, incorporating these data sets into a centralized data warehouse, and mapping GHGRP data to the data contained in the data warehouse. This task will entail the following steps:

- Identify external data sets and contact the respective data stewards to procure the data,
- Storing raw data,
- Record meta data
- Finalize an agreement to include the data set in a centralized Oracle database,
- Extract, transform and load external data into the Oracle database,
- Search for links between external data, GHGRP data, and other external data sources,
- Develop queries, techniques and tools to automate data processing and analysis.

EPA will provide further direction on which subparts to include under this task.

Deliverables and Schedule under Task 6.

		and the second s
Task 6.1	Draft list of outside data sets for 12 subparts	May 4, 2012
	Revised list of outside data sets for 12 subparts	May 25, 2012
Task 6.2	Draft strategy to use outside data sets for GHGRP verification	8 weeks after approval of task order
	Final strategy to use outside data sets for GHGRP verification	2 weeks after receiving EPA comments on draft strategy

Task 7: Develop Report Formats and Data Tracking Software

As needed, the contractor shall revise and update the existing VT output report templates. To this end, the contractor shall consider lessons learned from the first round of verification to develop a clear and easy-to-use format, as well as consider any unique design considerations associated with the 12 source categories that will begin reporting on September 28, 2012. The contractor shall ensure that updated versions of VT are programmed to generate results into the template formats.

The contractor shall update and maintain the existing verification tracking system (i.e., Sharepoint) or develop a new system that can be used to track the general status of annual GHG reports. The purpose of this tracking system is to provide easy-to-use tracking of the verification status of annual GHG reports, including total number of verification flags, number of open verification issues, number of closed verification issues, and the applicable deadline to resolve all verification issues. Ideally, this system will be set up to automatically retrieve relevant data from

existing systems, such as e-GGRT and VT, so that it provides timely updates and minimizes the potential for errors to occur in translating data. However, manually updating this tracking system is an acceptable option while an automated system is being developed, or if developing an automated system is not a feasible option. EPA will rely on this system to coordinate verification activities, provide routine updates to management, and track compliance.

Deliverables and schedule under Task 7.

H. S			
Task 7.1	Revised VT output report templates for 3/30/12 reporting	April 6, 2012	
	Revised VT and e-GGRT output report templates for 9/28/12 reporting	September 21, 2012	
Task 7.2	Draft tracking system	March 16, 2012	
Task 7.3	Final tracking system	April 13, 2012	

Task 8: Develop Instructions for Staff Verification

As needed, the contractor shall update program-wide verification instructions for existing subparts and develop instructions for the 12 subparts added in RY2011. Verification instructions will be based on the format and organization that have already been developed. In the instructions, the contractor shall list and update the lists of outside data sets that were identified as a reference for each subpart. The contractor shall also describe the overall verification process for subpart leads, including the order of priority for reviewing reports, the procedures and dates for notifying reporters of potential errors, and the record keeping requirements that subpart leads will need to follow. The contractor shall develop the verification procedures with input and approval from the TOPO.

As needed, the contractor shall provide training on the verification process and associated instructions, either in person or via web-ex.

Deliverables and Schedule under Task 8.

Task 8.1 Update instructions for subparts reporting on March 30, 2012 Finalize instructions for subparts reporting on March 30, 2012 Task 8.2 Drafts and update instructions for subparts reporting on September 28, 2012 Finalize instructions for subparts September 14, 2012	a alikuwa k		
reporting on March 30, 2012 Task 8.2 Drafts and update instructions for subparts reporting on September 28, 2012 Finalize instructions for subparts September 14, 2012	Task 8.1	•	March 26, 2012
subparts reporting on September 28, 2012 Finalize instructions for subparts September 14, 2012		-	April 6, 2012
•	Task 8.2	subparts reporting on September 28,	July 31, 2012
reporting on September 28, 2012		Finalize instructions for subparts reporting on September 28, 2012	September 14, 2012

Task 8.3	Training on verification instructions for reporting on March 30, 2012	March 2012	- / · · ·
	Training on verification instructions for reporting on September 28, 2012	September 2012	

Task 9: Quick Turn Around / General Verification Support

Under this task, the Contractor shall provide expert support to the TOPO and respond to requests related to verification and compliance tracking for presentation materials, meetings/workshops/training or other communication materials, conferences, technical briefings, or other analyses, often on a quick turn-around basis. The contractor shall also provide general verification support as directed by the TOPO, such as reviewing other verification protocols or other relevant documents, or developing outreach materials related to verification. This task has been provided in recognition of the significant amount of work associated with developing a verification process in a short time period and that unforeseen issues may arise.

Deliverables and Schedule under Task 9.

Task	Deliverable	Due Date
Task 9.1	No work should be undertaken or	Due dates will be
	travel initiated under this Task	determined in the TD.
7	until a technical directive TD has	
	been issued by the TOPO.	

IV. DELIVERABLE DISTRIBUTION

All deliverables shall be submitted to the TOPO at 1310 L Street, NW Washington, D.C. or submitted electronically. Deliverables shall be labeled with the contract number, task order number, and deliverable number. The Contractor shall provide the TOPO with at least one electronic copy of each deliverable.

V. PERIOD OF PERFORMANCE

The period of performance is from the effective date of the Task Order through September 30, 2013.

AMENDMENT OF SOLICITATION/MODIFIC	ATIC= CONTRACT		1. CONTRACT ID CODE.	PAG	GE OF PAGES
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CODE (b)(4)	FACILITY CODE		03/08/2012		
	11. THIS ITEM ONLY APPL	JES TO AMEN	DMENTS OF SOLICITATIONS		
☐ The above numbered solicitation is amended as set for	rth in Item 14. The hour and da	ate specified for	receipt of Offers 🔲 is	extended, []i	s not extended.
Offers must acknowledge receipt of this amendment p	rior to the hour and date specifi	ied in the solicit	ation or as amended, by one of the following	g methods: (a) By	completing
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to the solicitation and this amendment, and is received					
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See Schedule				·	
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D. OTHER (Specify type of modification	and authority)				
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E. IMPORTANT: Contractor 🗵 is not.	is required to sign this docu	ument and retur	n 0 copies to the is	ssuing office.	
14. DESCRIPTION OF AMENDMENT/MODIFICATION	Organized by UCF section hea	dings, including	g solicitation/contract subject matter where	feasible.)	
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IMPORTANT: Mark all packages and papers with contract and/or order numbers.

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03/08/2012 EP-W-11-054

ORDER NO. 0001

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STATEMENT OF WORK

Title: Support for Development of Verification Process for Greenhouse Gas Reporting Program

Task Order Project Officer (TOPO): Sean Hogan

US Environmental Protection Agency 1200 Pennsylvania Avenue, NW (6207J)

Washington DC 20460 Phone: (202) 343-9233 Fax: (202) 343-2359

E-mail: master.barbora@epa.gov

Alternate TOPO: Lisa Grogan-McCulloch

US Environmental Protection Agency 1200 Pennsylvania Avenue, NW (6207J)

Washington DC 20460 Phone: (202) 343-9743 Fax: (202) 343-2210

E-mail: Grogan-McCulloch.Lisa@epa.gov

Contracting Officer (CO): Christopher O. Jenson

U.S. Environmental Protection Agency 1200 Pennsylvania Ave, NW (3803R)

Washington, DC 20460 Phone: (202) 564-3268 Fax: (202) 565-2554

Email: jenson.christopher@epa.gov

I. BACKGROUND

In September 2009, EPA finalized the regulatory action that launched the EPA's Greenhouse Gas Reporting Program (GHGRP). Covered facilities will report 2011 GHG data to EPA on either March 31, 2012 or September 28, 2012, by using a web platform developed by EPA called the electronic GHG Reporting Tool ("e-GGRT") or by submitting a bulk XML file. The GHGRP is an annual reporting program, with report submissions due in subsequent years on March 31 of each year.

GHG data reported under the GHGRP will be verified by EPA. Prior to EPA verification, reporters are required to self-certify that the data they submit to EPA is truthful, accurate and complete. EPA reviews the GHG data, including emissions data from direct emitters and supporting data submitted from reporters, and verifies that they are complete, accurate, and meet the reporting requirements of this rule. EPA data verification ensures accuracy and completeness, such that EPA and the public are confident in using the data for developing climate policies and potential future regulations. Data that are not entitled to confidential

treatment will be published on EPA's website for public analysis.

In implementing verification of GHGRP data, EPA has developed a three step process, described below.

- 1. Automated Review of Data. First, EPA conducts an initial centralized review of the data which is largely automated. The automated review consists of two components. The first component is built in e-GGRT and is designed to provide reporters with real-time feedback before they officially submit their data. The second component is built in stand-alone software, referred to as the Verification Tool (VT), which pulls post-submittal data from e-GGRT and run pre-programmed tests to more closely assess the completeness and accuracy of the data. Both e-GGRT and VT generate output reports to summarize the verification findings and to flag possible errors and inaccuracies for follow-up.
- 2. Staff Review of Data. Second, subpart leads review the output reports, following program-wide instructions on verification priorities and procedures, and notify reporters of any potential errors, discrepancies, or questions. The purpose of this step is for reporters to resubmit their annual reports with corrected data or for the subpart leads to otherwise resolve the flags through analysis and communication with the reporters.
- 3. On-Site Visits. Third, EPA will maintain the option to conduct on-site visits of selected facilities and suppliers, in the event centralized verification identifies issues which warrant site visits to resolve. The purpose of site visits would be to further evaluate reported data based on records that are kept at the facility but not submitted (e.g., GHG monitoring plans), as well as field methods to measure and QA/QC data. To date, EPA has not encountered a situation where an on-site visit is required and it is considered to be unlikely in the future.

To date, EPA has developed and implemented this verification process, with exception for the on-site visits. The scope of this effort has included developing and coding the specifications for all of the checks that the VT used for 28 subparts, including range checks, algorithm logic checks, statistical tests, and substitute data checks. This also included developing the Oracle tables that were used to transfer GHG data and VT output reports between e-GGRT and the VT. Furthermore, this included developing the format and organization of the program-wide verification instructions and extensively researching the availability of outside data sources which could be used to evaluate data quality. In September 2011, the GHGRP received data for Reporting Year 2010 (RY2010), which was the first year that data was collected and successfully verified by the Program.

As further described in this SOW, future work will entail making updates to the VT and verification process before the GHGRP receives the next round of data in March and September 2012, running the VT and performing other verification procedures in 2012 and future years, and making ongoing improvements to the VT and verification process. With respect to ongoing

improvements, EPA is continually striving to more effectively integrate the GHGRP data collection system (e-GGRT) and the verification process. Therefore, while this SOW presents an approach for performing verification, EPA remains open to consider other tools and/or processes that meet the same objectives and schedule.

II. SCOPE

The work outlined under this requirement is consistent with Section 1.2.5 of the Contract Statement of Work.

III. TASKS AND DELIVERABLES

Task 1: Project Management

The Contractor shall provide project management under this task, and shall submit a Monthly Status Report to EPA's TOPO and Contracting Officer (CO) in accordance with the Project Reporting section below. During the Period of Performance (POP), the Contractor shall immediately inform the TOPO and CO by telephone and/or email of any problems that may impede performance along with any corrective action needed by the EPA or the Contractor to solve the problem.

Under this task, the Contractor shall also attend a kick-off meeting, either via conference call or in person, whichever is most cost-effective to the U.S. Government, to discuss the goals and strategy for completing the deliverables. This kick-off meeting swill serve as a brainstorming session to clarify the tasks, provide any necessary background material, solicit ideas and feedback from the Contractor, as well as formulate ideas for work to be completed by the Contractor under the Tasks listed below. The contractor shall develop a project timeline based on the statement of work and direction from the TOPO that incorporates the deliverable dates for all tasks. The Contractor, under this task, shall also attend a wrap-up meeting at the end of the POP to discuss work completed under the Tasks.

Deliverables and schedule under Task 1:

Task 1.1	Attend kick-off meeting	Within 1 week of approval of Task Order
Task 1.2	Project Timeline	Within 2 weeks of approval of Task Order
Task 1.3	Monthly Status Report	By 10 th business day each month
Task 1.4	Attend End of POP meeting	At least 2 weeks prior to end of POP, per TOPO direction

Task 2: Critical Review of Existing Verification Process (as it pertains to developing verification checks)

EPA successfully verified the first round of data collected through the GHGRP and, in the process, gained a lot of valuable experience which will need to be captured and used to further develop and refine the verification process. To this end, the purpose of this task is for the contractor to develop a thorough understanding of the existing verification process and the

lessons learned during the first round of verification so that opportunities for improvement are identified and addressed, where feasible.

To this end, the contractor shall perform a critical review of the existing GHGRP verification process. The objectives of this review are for the contractor to:

- establish a thorough understanding of the existing verification process and the systems used for verification, correspondence, tracking and reporting;
- identify opportunities to improve the existing process and develop recommendations for both near-term and long-term improvements; and
- develop a strategy to implement improvements while meeting the objectives and schedule described in this SOW.

The outcome of this effort will be a list of recommendations to improve the existing verification process and a proposal for implementing these recommendations. In the event EPA supports one or more of the recommendations, the recommendations will be implemented according to a process and schedule agreed upon by the TOPO.

Deliverables and schedule under Task 2:

Task 2.1	Meet with EPA verification	Within 2 weeks of approval of
	team	Task Order
Task 2.2	Summary of recommendations	Within 4 weeks of approval of
	and proposals to improve the	Task Order
	existing verification process	
	and/or systems	

Task 4: Develop Statistical Tests for Each Subpart

The contractor shall develop subpart-specific statistical checks for verification purposes. To date, statistical checks have not had a significant role in the GHGRP verification process given limitations on the data the Program collects, and there is only one year of data. However, looking ahead, EPA continues to be interested in developing statistical tests to evaluate GHGRP data.

The contractor shall determine what types of statistical analysis could be used to evaluate data collected by the GHGRP for the purpose of data verification. The contractor shall determine both the metrics to be used for verification from a technical standpoint as well as the specific statistical test that should be applied. For example, for many subparts it makes sense from a technical perspective to compare production data, where available, to emissions ratio of all facilities within a subpart, and then identify outliers as potential reporting errors. In this example, the contractor would identify the specific data reporting elements that would be used for the ratio as well as the statistical test that would be employed. EPA expects approximately 5-20 verification checks to be conducted on each subpart (perhaps more for subpart C), depending

on the complexity and number of reporters for each subpart. Below are some additional examples:

- Comparing site specific emission factors across facilities within a subpart to identify outliers;
 and
- If a subpart consists of facilities both with and without CEMS, comparing emissions from facilities without CEMS to emissions from facilities with CEMS.
- Comparing year-to-year emissions and other factors.

EPA expects that the contractor may recommend that some tests be run in parallel while others are run in series. For example, a test which yields outliers in emissions reported may be followed up by a test checking the inputs to the emission equation to isolate which variable caused the emissions to be an outlier.

In completing this task, the contractor shall investigate whether any statistical methods exist that could be applicable beyond the identification of outliers. The contractor shall also consider the use of data in other subparts to verify data in a given subpart. For example, perhaps data reported under subparts MM or P could be used for the purpose of verifying data reported under subpart Y. Lastly, the contractor shall consider whether data from other EPA (or non-EPA) reporting programs can be used to verify GGRP data.

The contractor shall prepare a strategy to develop and employee statistical checks in the GHGRP verification process. This strategy will present an approach and schedule to develop and implement statistical checks to verify data reported on March 30, 2012 and checks to verify data reported on September 28, 2012. This strategy will outline steps to develop statistical checks, incorporate statistical checks in the VT, and explain how verification issues identified by statistical checks will be used to evaluate data quality. The contractor shall also assess the relative strength of the statistical tests to help determine which statistical checks would be the most valuable for verification. The contractor shall implement the strategy approved by the TOPO.

Deliverables and Schedule under Task 4.

Task 4.1	Draft strategy to develop and implement statistical checks	8 weeks after approval of task order
	Final strategy to develop and implement statistical checks	2 weeks after receiving EPA comments on draft strategy

Task 5: Develop Algorithm Checks

The contractor shall develop algorithm checks to verify GHGRP data and/or refine existing algorithm checks. Similar to statistical analysis checks, the GHGRP has employed algorithm checks to a small extent to verify data. To data, these checks have been developed by the

respective EPA subject matter expert (SME) and their contractor to be incorporated in the VT. The purpose of this task is for the contractor to evaluate the algorithm checks used to date and develop a strategy to strengthen existing checks and/or create new checks which would be incorporated into the VT for future verification. The outcome of this effort would be feedback and guidance to the SMEs to assist them with developing and refining algorithm checks and/or development of algorithm checks for multiple subparts.

To this end, the contractor shall prepare a strategy and schedule to evaluate existing algorithm checks, as well as develop and/or refine and implement new or existing algorithm checks into VT. This strategy will present an approach and schedule to develop and implement algorithm checks to verify data reported on March 30, 2012 and checks to verify data reported on September 28, 2012. The contractor shall implement the strategy approved by the TOPO.

Deliverables and Schedule under Task 5.

Task 5.1	Draft strategy to develop and implement algorithm checks	8 weeks after approval of task order
•	Final strategy to develop and implement algorithm checks	2 weeks after receiving EPA comments on draft strategy

Task 6: Identify Other Data Sets to Evaluate GHGRP Data

The contractor shall identify existing data sets (e.g., EIA, NEI, State inventories, etc.,) that can be used to evaluate the data received for the 12 subparts listed under Task 3. In addition, the contractor shall develop a strategy to use outside data sets to verify GHGRP data. To date, EPA has identified an extensive list of data sets that are similar to GHGRP data and, therefore, might be useful to evaluate data quality. The purpose of this task is for the contractor to identify data sets that could be used to evaluate data collected under the new subparts, as well as to develop a strategy to effectively use the most relevant outside data sets to evaluate the quality of all GHGRP data.

In addition to identifying data sets for the 12 new subparts, the contractor shall prepare a strategy and schedule to effectively use relevant outside data sets to evaluate GHGRP data. This strategy should present an approach to identify data sets which include data that could be used for verification, as well as an approach to create a system that efficiently and effectively compares GHGRP to relevant data sets. Depending on the system that is proposed for comparing data, this system could be implemented under this contract and/or implemented by the SMEs. The contractor shall implement the strategy approved by the TOPO.

Deliverables and Schedule under Task 6.

Task 6.1	Draft list of outside data sets for 12	May 4, 2012
	subparts	

	Revised list of outside data sets for 12 subparts	May 25, 2012
Task 6.2	Draft strategy to use outside data sets for GHGRP verification	8 weeks after approval of task order
	Final strategy to use outside data sets for GHGRP verification	2 weeks after receiving EPA comments on draft strategy

Task 8: Develop Instructions for Staff Verification

As needed, the contractor shall update program-wide verification instructions for existing subparts and develop instructions for the 12 subparts added in RY2011. Verification instructions will be based on the format and organization that have already been developed. In the instructions, the contractor shall list and update the lists of outside data sets that were identified as a reference for each subpart. The contractor shall also describe the overall verification process for subpart leads, including the order of priority for reviewing reports, the procedures and dates for notifying reporters of potential errors, and the record keeping requirements that subpart leads will need to follow. The contractor shall develop the verification procedures with input and approval from the TOPO.

As needed, the contractor shall provide training on the verification process and associated instructions, either in person or via web-ex.

Deliverables and Schedule under Task 8.

Task 8.1	Update instructions for subparts reporting on March 30, 2012	March 26, 2012
	Finalize instructions for subparts reporting on March 30, 2012	April 6, 2012
Task 8.2	Drafts and update instructions for subparts reporting on September 28, 2012	July 31, 2012
	Finalize instructions for subparts reporting on September 28, 2012	September 14, 2012
Task 8.3	Training on verification instructions for reporting on March 30, 2012 Training on verification instructions	March 2012 September 2012
	for reporting on September 28, 2012	September 2012

Task 9: Quick Turn Around / General Verification Support

Under this task, the Contractor shall provide expert support to the TOPO and respond to requests related to verification and compliance tracking for presentation materials, meetings/workshops/training or other communication materials, conferences, technical briefings, or other analyses, often on a quick turn-around basis. The contractor shall also provide general verification support as directed by the TOPO, such as reviewing other verification protocols or other relevant documents, or developing outreach materials related to verification. This task has been provided in recognition of the significant amount of work associated with developing a verification process in a short time period and that unforeseen issues may arise.

Deliverables and Schedule under Task 9.

Task 9.1	No work should be undertaken or	Due dates will be
	travel initiated under this Task	determined in the TD.
	until a technical directive TD has	
	been issued by the TOPO.	

IV. DELIVERABLE DISTRIBUTION

All deliverables shall be submitted to the TOPO at 1310 L Street, NW Washington, D.C. or submitted electronically. Deliverables shall be labeled with the contract number, task order number, and deliverable number. The Contractor shall provide the TOPO with at least one electronic copy of each deliverable.